



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
324 EAST ELEVENTH STREET  
KANSAS CITY, MISSOURI - 64106

CERTIFIED MAIL

Return Receipt Requested

SEP 30 1983

Mr. James Boyd  
Vulcan Materials Company  
P.O. Box 12283  
Wichita, Kansas 67277

EPA I.D. NO.: KSD007482029

Attention: Mr. Gary Mason

Dear Mr. Boyd:

The Environmental Protection Agency (EPA) and Kansas Department of Health and Environment (KDHE) have reviewed the Resource Conservation and Recovery Act (RCRA) Part B permit application submitted on August 5, 1983. The following comments result from a joint completeness review of the permit application. A completeness review determines if all regulatory requirements have been addressed in the application. After the application is determined to be complete, we will conduct a technical review. When preparing a response to this letter you can provide revised application pages with a cover letter or respond to the comments in a letter and revise the application after all review comments have been resolved. Also, a copy of your response to this letter should be submitted to KDHE.

Part A Application

1. The following items on the revised Part A application must be completed:
  - A. Form 1, Section VIII.C. Status of Operator should be checked.
  - B. Form 3, Section VIII. Facility Owner item A. or B. should be completed. It is satisfactory to complete these corrections without obtaining a new signature.

Topographic Map

2. The Part B application must include a map meeting the scale and contour interval requirements. The map should include surface waters, access control, buildings (treatment, storage or disposal operations or other structures) and location of hazardous waste management facilities. The maps submitted showing legal boundaries of the site and injection and withdrawal wells were difficult to interpret. The well locations and facility boundary should be included on the revised map or the locations of the hazardous waste management facilities and any other clarifying information should be included on the maps showing well locations and facility boundaries.

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Superfund

3. The date of the wind rose should be specified.
4. On the map illustrating surrounding land uses, the land uses north of the Vulcan plant should be identified on the map.

#### Traffic Patterns

5. The following items must be addressed for the movement of hazardous wastes within the facility:
  - A. Estimated number of truck loads of hazardous waste removed from the site annually.
  - B. Traffic routes and traffic control signals within the plant along routes used by hazardous waste transporters.

#### Waste Analysis Plan

6. Is more recent data on the hex waste available (Table C-1)? Why is the hex waste analyzed for only a portion of the Appendix VII constituents for which K016 is listed?
7. Is the interceptor well water analyzed for other constituents?
8. The application should contain a more detailed description of the sampling techniques and sample locations (reference for sampler). The level of detail provided in the description of sampling for the process wastewater should be provided for the other waste streams.

#### Security Procedures

9. The application does not address the requirement for "Danger - Unauthorized Personnel Keep Out" signs. The signs must be posted at each entrance to the active portion of a facility and at other locations in sufficient number to be seen from any approach to the active portion. The active portion is defined in 260.10 as "that portion of a facility where treatment, storage or disposal operations are being or have been conducted...and which is not a closed portion."

#### General Inspection Requirements

10. The application must include an inspection log or summary containing the date and time of inspection, name of inspector, note of observations made and date and nature of repairs or remedial action. The application refers to a check sheet, but the check sheet was not attached.

#### Preparedness and Prevention

11. The application must contain a more detailed waiver from the equipment requirements.

12. The remaining Part 264, Subpart C requirements with the exception of aisle space which has been addressed, must be addressed in the application.

#### Contingency Plan

13. All RCRA contingency plan requirements of Part 264, Subpart D must be addressed. These requirements can be included in the existing site emergency plans. The regulations do not include provisions for a waiver or exemption from the requirements for a contingency plan.

#### Training Plan

14. Vulcan is to be complimented on the excellent training program submitted in the Part B application. One item needs clarification, the discussion on recordkeeping on page 103 does not indicate that job titles and job descriptions are maintained on file at the facility.

#### Closure

15. The following comments resulted from review of the closure plan portion of the application:

A. The cost estimate for closure of the drum storage area does not include a cost for off-site disposal of drums.

B. Either an "estimated" expected year of closure or a statement as to why an expected year of closure cannot be provided must be included in the application.

C. Maximum inventory of hex waste to be incinerated at closure and how the hex waste would be handled if incineration is not possible.

#### Closure/Post-Closure Financial Assurance

16. The financial test and supporting documentation submitted April 25, 1983, to the Kansas Department of Health and Environment (KDHE) satisfies the requirements of §264.143(f) except for the copy of the annual CPA report for fiscal year 1982, which was mentioned in the special CPA report. Please send a copy of the CPA annual report for fiscal year 1982 to KDHE and EPA, Permits Section.

17. We note that your financial test documentation includes for the Wichita facility a post-closure cost. However, I-6 of your application states there will be no post-closure activities or costs. When Vulcan updates the Chief Financial Officer letter and supporting financial documentation within 90 days of the close of each succeeding fiscal year, the post-closure cost may be removed from your Chief Financial Officer letter.

18. By March 31 of each year, you must submit current financial data per §264.143(f)(3) to the Kansas Department of Health and Environment with a copy to EPA, Permits Section.

Liability Insurance

19. The financial test criteria used in Alternative I is more than adequate to cover liability insurance at minimum levels for sudden insurance coverage, per §264.147(a).

Container Storage Area

20. The application should describe how accumulated precipitation is handled. Is the capacity of the containment system adequate to contain accumulated precipitation? We recommend that outside, uncovered containment systems have adequate capacity to contain precipitation from a 24 hour, 25 year storm event.

21. The statement on page 47 that the container storage area is inspected regularly should be changed to state that the container storage area is inspected weekly.

Incinerator

22. Prior to determining if the application can be approved without a trial burn, the criteria specified in Section 270.19(d) (formerly 122.25(b)(5)) must be met. In order to make this determination the information specified in Section 270.19(c) must be included in the permit application. For ease of preparation and review, we would suggest supplying the information in the order outlined in the regulations.

Please provide a response to this letter by November 21, 1983. Failure to furnish the requested information on time could result in an enforcement action. If you have any questions on this letter, please contact Karen A. Flournoy at (816) 374-6531. Questions on review of the incinerator portion of the application should be directed to Mr. Steve Busch, EPA, at the same telephone number.

Sincerely yours,

*Lyndall L. Hamington*

for Robert L. Morby  
Chief, Waste Management Branch  
Air and Waste Management Division

cc: John Goetz, KDHE  
Dale Stuckey, KDHE